

Message

From: MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]
Sent: 8/9/2017 11:11:02 PM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]
CC: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]; Keller, Lynn [Keller.Lynn@epa.gov]
Subject: RE: Area 40 - Requested Information Review Update

Hi Chris,

A lot of those previously mentioned items are looking down the road some distance but nonetheless will keep momentum once those stages are reached (OPEA and OLC). I cannot state the implications of the RAD comments because the review is ongoing and I do not have the final memo just verbal feedback from the reviewer. Depending on the data gaps and extent of issues more fieldwork and analysis may be required. Let's see what the written comments say.

Obviously we cannot move forward on the RAP/ROD until the FS is complete. This will require the results of the Ambient Air Sampling to be finished to support the USEPA HHRA, including any additional sub-surface soil vapor sampling DTSC & the Agencies require to support land use planning/remedies. Realistically we cannot finalize the FS until next Spring (April 2018?) when the final seasonal events have been completed and analyzed. Correct?

DTSC committed to today (8/9) for additional Site characterization data unfortunately I do not have any documentation from GSU so this is an outstanding action item. I will advise when I have an update from support staff.

Thank you for your understanding.



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From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Wednesday, August 09, 2017 3:47 PM
To: MacNicholl, Peter@DTSC
Cc: MacDonald, Alex@Waterboards; Keller, Lynn (Keller.Lynn@epa.gov)
Subject: RE: Area 40 - Requested Information Review Update

Hi Pete - I'm sorry, I'm not sure I follow. I could interpret this two ways:

1. This is good news stating that you are almost finished with your review and you are progressing toward a RAP. Your reviews with OPEA and EPA and OLC and Program management are all to inform them that we are almost done and, following a bit of additional investigation data, are ready to prepare the RAP?

2. This is bad news stating you are not done with your review, there are significant issues with anomalies not previously identified and RAD investigation, there is now a feeling that ambient air data is needed to make remedy decisions and you now need to talk to Program Management to figure out path forward.

Please clarify.

Regarding DQOs for Ambient Air Sampling and sub-surface soil vapor sampling. AR has agreed to provide the ambient air sampling plan by today and we plan to honor that commitment. AR has not agreed to provide any information regarding soil vapor sampling because we feel we have sufficient soil vapor data to progress the site to remedy. DTSC had agreed to provide their evaluation of site characterization to AR so we could develop a SAP to close any remaining DTSC data gaps. When will DTSC provide this evaluation?

Chris

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From: MacNicholl, Peter@DTSC [<mailto:Peter.MacNicholl@dtsc.ca.gov>]
Sent: Wednesday, August 09, 2017 3:20 PM
To: Fennessy, Christopher
Cc: MacDonald, Alex@Waterboards; Keller, Lynn (Keller.Lynn@epa.gov)
Subject: [EXTERNAL] Area 40 - Requested Information Review Update

Hi Chris,

I wanted to provide a review/progress update on the sub-surface soil gas/soil/GW characterization data; aerial photos; RAD Review; CEQA; Interagency Agreement; and, RAP/ROD pathway forward:

- Soil Gas/Soil & GW Data assessment by Dan Gallagher is continuing. I will meet with Dan tomorrow to determine the readiness of his comments/feedback on the data gaps.
- Aerial Photo Reviews have determined some anomalies in potential operational areas not depicted in the current Site extents and will be summarized to AR by the end of the this week.
- RAD review has determined some discrepancies in the Dec. 2014 RAD Survey and potentially unaddressed USEPA comments with fieldwork implementation. Written comments on both the 2014 RAD Survey and 2015 RI Supplement may be available for distribution by next week depending of the availability of the HERO staff memo.
- Program met with OPEA staff today to introduce the project details, objectives, and status of previously submitted environmental impact reports. Planning to go over the related historical activities with Steve Ross to ensure complete understanding and identify action items.
- Corresponded with Lynn Keller and tentatively identified Aug. 18th as submittal date of draft interagency agreement. Setup meeting with DTSC OLC on Aug. 28th to go over project deliverables and language in both Draft Interagency Agreement and PSA.
- Plan to meet with Program management this week to go over the planned pathway forward in light of the most recent Ambient Air Sampling data and revised objectives provided by AR. Will determine the appropriateness of proposed remedy in RAP/ROD and contingent future uses for land once data is available.

- Chris – Based on the July 19th meeting action items DTSC was awaiting the DQOs for Ambient Air Sampling; and, sub-surface soil vapor sampling from AR. Please provide at your earliest convenience. Thank you.

Sincerely,



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